

CODE OF CONDUCT AND ETHICS

VG-ETH-006-PUB



PURPOSE

This Code sets the minimum standards of lawful, honest, respectful and professionally responsible conduct expected of people acting for Valhalla.

PUBLIC COMMITMENT

- People acting for Valhalla are expected to act lawfully, honestly and respectfully.
- Technical, research, financial and public records must not be deliberately false or misleading.
- Concerns may be raised without retaliation and will be considered in a manner proportionate to their seriousness.

STATUS	Published
POLICY OWNER	Managing Director
PROPOSED APPROVER	Valhalla Board
PUBLICATION	Published v1.0

1. Application

Valhalla is an Australian-based private company. This document is applied in a practical and adaptable manner, with controls suited to the nature and risk of the activity. The Managing Director may set or adjust implementation arrangements, subject to law, contracts and matters reserved to the Valhalla Board. Ordinary operations may proceed within approved budgets and delegations. A significant departure from ordinary operations, material change, unusual commitment, new jurisdiction or matter outside approved authority must be documented and approved before implementation, including by the Valhalla Board where required.

This Code applies to directors, employees, contractors and others acting on behalf of Valhalla. Partners and suppliers may be asked to follow equivalent standards through their agreements with the company.

2. Core standards

- comply with applicable laws, contracts, approvals and professional obligations;
- act honestly and avoid conduct intended to deceive, improperly influence or conceal;
- treat colleagues, students, partners, community representatives and other stakeholders with dignity and professional respect;
- do not engage in bullying, harassment, discrimination, victimisation, threats or violence;
- protect company and third-party information and use resources only for authorised purposes; and
- raise material safety, integrity, legal or ethical concerns promptly.

3. Technical and research integrity

Valhalla expects work to be undertaken with care appropriate to its purpose. People should distinguish observations from interpretation, identify material assumptions and limitations, and avoid presenting preliminary, AI-assisted or uncertain outputs as established fact.

Fabrication, falsification, deliberate omission of material contrary information, plagiarism and improper manipulation of data, maps, models, images, results or authorship are prohibited.

4. Conflicts, benefits and company opportunities

Actual, potential or perceived conflicts should be disclosed before participating in a related decision. Gifts, hospitality, sponsorships or other benefits must not be offered or accepted where they could improperly influence, or reasonably appear to influence, a decision.

A person must not misuse Valhalla's information, position, relationships or opportunities for undisclosed personal benefit.

5. Records and communications

Business, expense, technical, research and approval records should be accurate enough for their purpose. Public statements and partner communications should be authorised and should not create a misleading impression through exaggeration, omission or lack of context.

6. Concerns and response

Concerns may be raised with the Managing Director, a director or through the reporting arrangements described in the Speak-Up, Whistleblower and Complaints Policy. Valhalla may respond through advice, clarification, corrective action, access restrictions, training, contract remedies, disciplinary action or referral to an appropriate authority, depending on the circumstances.

Retaliation against a person who raises a genuine concern is prohibited. Knowingly false or malicious allegations are not protected conduct.

Related documents

- Conflicts of Interest Principles
- Anti-Bribery and Integrity Policy
- Speak-Up, Whistleblower and Complaints Policy
- Technical Claims, Methodology and Corrections Statement

Document control and approval

Public reference	VG-ETH-006-PUB	Version	1.0
Status	Published	Publication	Published v1.0
Policy owner	Managing Director	Proposed approver	Valhalla Board
Approved by	C.Dubieniecki	Approved date	August 12th 2026
Review cycle	Bi-Annually or as board requires	Review date	August 12th 2028
Internal source	Code of Conduct and Ethics		

PUBLICATION CONTROL Published v1.0. This is the current website publication. Procedures may be adapted proportionately, but any substantive amendment to the published commitments requires controlled review, approval and versioning.